

## REMARKS

Reconsideration of the patentability of the claims of the above referenced application is solicited in view of the above amendments and the following comments.

This invention is directed to a radio wave receiver and associated equipment that have certain properties and functions that are not shown in the prior art. An important property of the instant radio receiver is that it has stored in it, a plurality of voice tones. In a preferred embodiment, these voice tones correspond to notes of a chromatic scale. The receiver is adapted to receive broadcast message data that contains codes that activate certain of these voice tones such that, by properly selecting the specific codes that are broadcast, the receiver converts these codes to corresponding voice tones and plays a song that is "sung" in simulation. That is, the sung song that is heard at the receiver is a simulation of the song as a function of the stored voice tones, rather than receiving a broadcast of an actual singer singing the song, or of a recording of the singer singing the song.

In another embodiment of this invention, picture data are also broadcast that are adapted to be displayed at the receiver. Means are provided in the receiver to coordinate the displayed picture data with the simulated voice data so that, to one observing the result, it appears that the pictured singer is singing the song.

*not claimed  
disclosed*

None of the prior art discloses such an operation or the apparatus needed to accomplish these objectives.

In the outstanding action, the examiner has rejected many of applicants' claims based on the assertion that the combination of the Motorola reference and the Wong reference can be assembled to result in this same system. That position of the examiner is respectfully traversed. Neither the Wong reference, nor the Motorola reference, disclose a receiver having a plurality of voice tones built into it. Neither reference discloses these tones to be elements of a chromatic scale. Neither of these references discloses how to assemble tones embodied in a receiver into a song. Neither reference discloses activating a series of voice tones as a function of broadcast

*not claim*

codes that are received by the receiver so that the activated tones constitute a song. Neither reference discloses coordinating the voice tones activated by reception of a series of broadcast codes with received message data adapted to be displayed at the receiver. So that the end result is a visual and audible simulation of a singer singing the song.

The examiner has contended that the Motorola reference discloses a pager that is adapted to receive codes. The received codes perform various functions, such as identifying the address to which the message has been sent and determining if the specific pager is the correct address. Further, the received codes convey visual information for display on the pager. Still further, the received codes activate a sound generator that generates recalled tones to be heard by the user.

*A*

However, despite the examiner's assertions to the contrary, there is no disclosure in the reference of activating a series of chromatic scale voice tones such as to reproduce a song. There certainly is no disclosure of coordinating such activated voice tones with a pictorial display whereby to simulate the depicted singer singing the activated voice tones and thereby performing the song.

*A*

Clearly, the Motorola disclosure is of a simple pager that provides an audible tone that tells the user that there is a message. That same pager also provides a visible message, a phone number or the like. The audible tone is coordinated with the visual display information, but they do not cooperate with each other to produce a combined result. The tone acts as a signal to the user that a message has been received. The display shows the message. The tone and the message are unrelated and do not cooperate to create something that is a combination of the two as is the case in the instant invention.

The examiner has cited the Wong reference as disclosing a pager that generates audible messages in response to received message codes such that the call back number is associated with a specific audible tone that is displayed in a table format. This may be so, but even if it is, it has nothing whatever to do with this invention. In the instant invention, the user freely selects data transmitted from the transmission side and registers and stores the selected data in a state that is associated with a specific sound pattern. In the reference, the table that must be employed

*not clear*

fixes the relationship between the tones and the data in advance. That is not the case in the instant invention where the broadcast codes can be different each time, whereby the series of voice tones is different each time, wherefore the pictorial representation is necessarily different for each transmission.

Neither the Motorola nor the Wong references disclose applicants' relationship between a received code activated series of voice tones and a particular song. Neither relates these received codes that activate voice tones with receive message data that control a pictorial display so as to coordinate the two into a new whole. Therefore, the rejections based on this combination of references should be withdrawn as not even meeting the test for *prima facie* obviousness, let alone supporting a rejection of the instant claims as being obvious.

*voice message system  
106-108  
never used*

Other of applicants' claims have been rejected as being directed to subject matter that would have been obvious in view of the disclosures of these same two references in further combination with the disclosure of the cited '520 patent. The examiner has alleged that this added reference shows a voice message pager system. The examiner asserts that this added reference discloses a pager that makes additional information, in the form of audible information, available to the user. In fact, the reference has a single voice message telling the user that he has a message. There is no disclosure of a series of voice tones resident in the receiver and means to receive code that activates these voice tones in a selected manner to create a whole song. The selected manner can be different each time the receiver is activated whereas in the reference, the voice message is always the same.

*never used*

Lastly, the examiner seeks to combine the disclosures of four (4) references to support a rejection of claims 8-10. In the first place, it is pointed out that if it takes a combination of four (4) references to suggest the content of a claim, that claim probably defines a patentable invention. It is unreasonable to expect a person of ordinary skill in the art to be able to pick and choose pieces of four (4) different references and assemble them in the required manner to reproduce applicants' invention. The mere fact that it takes four (4) references to reject these claims is strong evidence of patentability of these claims.

The added Kawashima reference is alleged to disclose the use of an audible composition as an adjunct to a pager. This is the conventional "BEEP" that a pager gives off to tell the user that he has a message. This is not the selection of a series of voice tones that are resident in the receiver to reconstitute a song. The reference's "BEEP" is a simple call to the user to look at his pager for a message. That is not what applicants are claiming here.

It is urged that the examiner reconsider this application, and specifically the claims thereof, and find the claims to be allowable over the cited and applied art.

Respectfully submitted,

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